

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

True the Vote, Jane Coln, Brandie Correro, §
Chad Higdon, Jennifer Higdon, Gene §
Hopkins, Frederick Lee Jenkins, Mary §
Jenkins, Tavish Kelly, Donna Knezevich, §
Joseph Knezevich, Doris Lee, Lauren Lynch, §
Norma Mackey, Roy Nicholson, Mark §
Patrick, Julie Patrick, Paul Patrick, David §
Phillee, Grant Sowell, Sybil Tribble, Laura §
VanOvershelde, and Elaine Vechorik §

Plaintiffs, §

v. §

Cause No. 3:14-cv-00532-NFA

The Honorable Delbert Hosemann, in his §
official capacity as Secretary of State for the §
State of Mississippi, The Republican Party of §
Mississippi, Copiah County, Mississippi §
Election Commission, Hinds County, §
Mississippi Election Commission, Jefferson §
Davis County, Mississippi Election §
Commission, Lauderdale County, §
Mississippi Election Commission, Leake §
County, Mississippi Election Commission, §
Madison County, Mississippi Election §
Commission, Rankin County, Mississippi §
Election Commission, Simpson County, §
Mississippi Election Commission, and Yazoo §
County, Mississippi Election Commission §

Defendants. §

PLAINTIFFS TRUE THE VOTE, ET. AL.'S WITNESS LIST

Plaintiffs True the Vote, *et. al.* file this Witness List in preparation for the hearing to take place Thursday, July, 24, 2014 at 9:00am.

1) Engelbrecht, Catherine

- a. Ms. Engelbrecht is the designated corporate representative of True the Vote.
- b. Ms. Engelbrecht has personal knowledge of the efforts by True the Vote to obtain unredacted copies of voter registration records related to the Mississippi 2014 Republican Senate Primary Election (the "Election").

2) Harding III, Phillip C.

- a. Mr. Harding has personal knowledge of efforts of Mississippi citizens to review and analyze voter registration records pursuant to open records requests.
- b. Mr. Harding witnessed destruction of voter registration records at the direction of party executive committee members.
- c. Mr. Harding witnessed tampering of original voter registration records by a Circuit Clerk.

3) Nicholson, Roy

- a. Mr. Nicholson is an individual plaintiff.
- b. Mr. Nicholson has been denied access to unredacted voter records.
- c. Mr. Nicholson has personal knowledge of individual plaintiff's concerns of voter dilution.

4) Patrick, Julie

- a. Ms. Patrick is an individual plaintiff.
- b. Ms. Patrick has been denied access to voter records, including pollbooks.
- c. Ms. Patrick has personal knowledge of individual plaintiff's concerns of voter dilution.

5) Swenson, Ellen

- a. Ms. Swenson is a volunteer for True the Vote.
- b. Ms. Swenson has personal knowledge of records requests from Mississippi counties, and obtaining copies of redacted records.

6) Turner, Kim

- a. Ms. Turner is the Assistant Secretary of State, and is in charge of the Secretary of State's Election Division.
- b. Ms. Turner has personal knowledge of the advice provided by the Secretary of State's Office to Mississippi Circuit Clerks, regarding whether birthdates should be redacted, and other information made available.

Plaintiffs further reserve the right to call as witnesses any Defendants, including Mr. Nosef if he is available¹, or Mississippi Circuit Clerks who may attend the hearing, and may

¹ Mr. Nosef is the chairman of the Republican Party of Mississippi and attended the telephonic hearing on behalf of the Republican Party of Mississippi on July Mr. Nosef has personal knowledge of the efforts made by the Republican party, or the lack thereof, to preserve the integrity of voter eligibility records.

offer evidence as to directions received regarding redaction of birthdates or disclosure of voter registration/eligibility records.

Dated: July 22, 2014

Respectfully submitted

/s/ L. Eades Hogue

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2014 a copy of Plaintiffs' Witness List was served on The Secretary of State, The Republican Party of Mississippi; the Copiah County, Mississippi Election Commission, the Hinds County, Mississippi Election Commission; the Jefferson Davis County, Mississippi Election Commission; the Lauderdale County, Mississippi Election Commission, the Leake County, Mississippi Election Commission, and the Madison County, Mississippi Election Commission via the Court's e-file service. Plaintiffs have served the remaining Defendants (including Rankin, Simpson and Yazoo County Election Commissions), who have not yet registered to the Court's ECF system for this matter, via United States Postal Service, in accordance with Federal Rules of Civil Procedure.

/s/ L. Eades Hogue